

212609

BAKER & MILLER PLLC

ATTORNEYS and COUNSELLORS

2401 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20037

TELEPHONE: (202) 663-7820
FACSIMILE: (202) 663-7849



William A. Mullins
wmullins@bakerandmiller.com

Direct Dial: (202) 663-7823

November 23, 2004

BY HAND DELIVERY

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423-0001

ENTERED
Office of Proceedings

NOV 23 2004

Part of
Public Record

Re: *Kansas City Southern - Control - The Kansas City Southern Railway Company, Gateway Eastern Railway Company, And The Texas Mexican Railway Company; Finance Docket No. 34342*
SIP Implementation Plan Table

Dear Secretary Williams:

Subsequent to my letter to you dated November 4, 2004, which enclosed a final Safety Integration Plan ("SIP") and corresponding Implementation Plan table for the captioned proceeding, the Federal Railroad Administration ("FRA") requested that Kansas City Southern add certain information to the last line of the Implementation Plan table. That information has been added, as reflected on the attached Implementation Plan table.

I am enclosing herewith an original and 26 copies of the revised Implementation Plan table as agreed to by FRA. There were no changes to the SIP narrative filed on November 4. We understand that with these additions to the table, FRA will soon be filing a letter with the Board showing their concurrence in the entire SIP and Implementation Plan table.

Please acknowledge receipt and filing of these materials by appropriate notation on the eleventh copy enclosed for that purpose. By my signature below, I certify that a copy of the attached document is being served today upon all parties of record to this proceeding by first class mail.

Sincerely,

William A. Mullins

cc: Parties of Record
Federal Railroad Administration c/o
Ronald Newman and G. Joseph King, Esquire
STB Section of Environmental Analysis

**SAFETY INTEGRATION PLAN – KCSR / TEX MEX
IMPLEMENTATION TABLE**

Description	Timing	Resource	Accountability	Comments
Training Session with Tex Mex Safety Committee 1. Training session - all safety committee members 2. Inclusion in regional safety meetings and SACP process.	2 nd qtr 2005 1 st qtr 2005	\$20,000 10 employee days	Jim Riney / Jerry Heaven	This will foster greater craft employee ownership and influence for safety. This involvement of Tex Mex in the SACP process will assist in communication with all parties. (Training and meetings are often part of a person's salary and not considered additional expense.)
Review Public Safety Process and Develop Action Plan 1. Review public safety process at Tex Mex. 2. Develop action plan to enhance process.	1 st qtr 2005 2 nd qtr 2005	\$5,000 \$25,000	Allen Pepper / Victor Garcia	The additional expertise and experience that Mr. Pepper will add to the Public Safety process should help reduce the risks of crossing collisions and trespasser incidents. Mr. Pepper is anticipating the data and records review process to develop and integrate public safety action plans.

**SAFETY INTEGRATION PLAN – KCSR / TEX MEX
IMPLEMENTATION TABLE**

Remote Control Technology 1. Expand the Certification of Locomotive Engineers and Remote Control Operators Submission to include Tex Mex. 2. Develop projected schedule for implementation of RCL on Tex Mex. 3. Install any necessary RCL equipment on locomotives. 4. Train applicable transportation employees on RCL.	2006	\$400,000 (4-units)	Mike Chapman / Jim Riney	KCSR has developed and implemented an RCO training process that meets the requirements as identified in FRA's Safety Advisory 2001-01. It includes one week of classroom training and one week of field training. RCO equipment installation is anticipated sometime in 2006. It is anticipated that four locomotives will be equipped for RCO units on Tex Mex.
Hazmat Supervisor Training 1. Develop hazmat supervisor level training course. 2. Provide training to all KCSR and Tex Mex trainmasters, yardmasters and higher.	Completed 3 rd & 4 th qtr 2004	\$30,000	Chet Culley	This advanced training will be provided to selected individuals to further enhance emergency response on KCSR and Tex Mex.
Track Safety and Structures Compliance 1. Compliance with FRA's Track Safety Standards	End of 2005	\$6 million	Oliver Waltman/Jim Riney	Track maintenance necessary to maintain track safety and to be fully compliant with FRA's Track Safety Standards in 49 C.F.R. Part 213 will be funded through cash generated by Tex Mex's operations or KCSR's funds.